

# **EXHIBIT 6**

**To**

**DECLARATION OF ALEXANDER E. GASSER  
IN SUPPORT OF**

**DEFENDANTS OPTREX'S, FUJIFILM'S AND  
SAMSUNG SDI'S OPENING MEMORANDUM OF LAW  
IN SUPPORT OF THEIR PROPOSED CLAIM CONSTRUCTION**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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HONEYWELL INTERNATIONAL INC. and  
HONEYWELL INTELLECTUAL PROPERTIES  
INC,

Plaintiffs,  
C.A. No. 04-1338-KAJ

v.

(Consolidated)  
APPLE COMPUTER, INC., et al.,

Defendants.  
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DEPOSITION OF IAN LEWIN  
VOLUME II, PAGES 147 - 408  
MARCH 6, 2008

(The following is the continued deposition  
of IAN LEWIN, taken pursuant to the Federal Rules of  
Civil Procedure, via videotape, at the offices of  
Robins, Kaplan, Miller & Ciresi, LLP, 2800 LaSalle  
Plaza, 800 LaSalle Avenue, Minneapolis, Minnesota,  
commencing at approximately 8:31 a.m. on March 6,  
2008.)

STIREWALT & ASSOCIATES  
MINNEAPOLIS, MN 1-800-553-1953 info@stirewalt.com

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1 APPEARANCES:

2 On Behalf of the Plaintiffs:

3 Matthew L. Woods and Peter N. Surdo  
4 ROBINS, KAPLAN, MILLER & CIRESI, LLP  
5 2800 LaSalle Plaza  
6 800 LaSalle Avenue  
7 Minneapolis, Minnesota 55402

8 On Behalf of the Defendant Optrex America, Inc.:

9 Andrew M. Ollis  
10 OBLON, SPIVAK, MCCLELLAND, MAIER &  
11 NEUSTADT, P.C.  
12 1940 Duke Street  
13 Alexandria, Virginia 22314

14 On Behalf of Samsung:

15 Stephen S. Korniczky and Elizabeth L. Brann  
16 PAUL HASTINGS JANOFISKY & WALKER LLP  
17 3579 Valley Centre Drive  
18 San Diego, California 92130

19 On Behalf of Fuji Film:

20 Lawrence Rosenthal and Ian G. DiBernardo  
21 STROOCK & STROOCK & LAVAN LLP  
22 180 Maiden Lane  
23 New York, New York 10038

24 ALSO APPEARING:

25 Michael J. Domin, Videographer  
Elliott Schlam  
Robert D. Smith-Gillespie

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1

## I N D E X

2

## EXHIBITS

## DESCRIPTION

## PAGE MARKED

3

Ex 527 Lewin's Expert Witness Cases

4

Related to Patents

150

5

528 Seminar M-9: Principles of LCD

6

Backlighting, presentation to

7

SID

172

8

529 U.S. Patent 4,277,817

245

9

530 SID 1990 Seminar Lecture Notes,

10

Volume I, May 14, 1990

2867

11

531 U.S. Patent 5,414,599

315

12

532 Vikuity Display Enhancement

13

Brochure

344

14

533 U.S. Patent 4,804,253

345

15

534 Japanese Unexamined Patent

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Application Publication H2-212880

353

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535 U.S. Patent 5,076,661

367

18

536 Merriam-Webster definition of

19

"slight"

386

20

537 Merriam-Webster definition of

21

"few"

387

22

## WITNESS

## EXAMINATION BY

## PAGE

23

Ian Lewin

Mr. Ollis

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24

Mr. Rosenthal

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Mr. Woods

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25

Mr. Rosenthal

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1 asked and answered.

2 A. I can assure you this was the last thing  
3 that I spent last night thinking about.

4 Q. But you were informed by the contents of the  
5 specification, were you not, as to the meaning of  
6 "slight misalignment?"

7 A. Yes.

8 Q. And you saw the word "few degrees," did you  
9 not?

10 A. Yes.

11 Q. What does the word "few" mean to you?

12 A. Slight.

13 Q. Then -- well if they have identical  
14 meanings, what is -- what -- what in -- in --

15 Stepping aside from this patent, when -- if  
16 you saw the word "slight," what would that mean to  
17 you?

18 A. Stepping aside from the patent? I haven't  
19 really thought about what the word means, whether it  
20 has any meaning other than the normal English usage.

21 Q. And what is your --

22 A. It -- it -- it is defined in the patent as  
23 two to 16 degrees, and that really to me is -- is  
24 the -- the consideration.

25 Q. What is the normal-English-usage meaning of

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1 "slight?"

2 A. I would prefer to look that up in a  
3 dictionary, but I presume it's something like  
4 "somewhat."

5 MR. ROSENTHAL: Will the reporter please  
6 mark this document.

7 MR. WOODS: Well prepared.

8 (Exhibit 536 was marked for  
9 identification.)

10 BY MR. ROSENTHAL:

11 Q. Obviously, we anticipated perhaps that you  
12 might want to see a dictionary. This is an online  
13 Merriam-Webster dictionary. Are you familiar with  
14 Merriam-Webster dictionary?

15 A. I have heard of this dictionary, and I'm  
16 deeply grateful for you producing this reference.

17 Q. All right. And so does this help you to --

18 Oh. First of all, the Exhibit No. --

19 MR. ROSENTHAL: What was that again?

20 THE REPORTER: 536.

21 Q. -- Exhibit 536 is an online printout of the  
22 definition of "slight" from Merriam-Webster OnLine.

23 A. Yes.

24 MR. WOODS: Do we know, counsel, just so I  
25 can interpose an objection, do -- do -- was this

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1 generated from 1990, 1992, 1994?

2 MR. ROSENTHAL: 2008.

3 MR. WOODS: 2008. Okay.

4 MR. ROSENTHAL: All right.

5 Q. Does the word "slight" --

6 Does this help you understand what the word  
7 "slight" means in normal English usage?

8 A. Yes, it does, tremendously.

9 Q. And what does it mean?

10 A. Well it has two general forms of meaning,  
11 "having a slim or delicate build : not stout or  
12 massive in body : lacking in strength or substance :  
13 deficient in weight, solidity, or importance." And  
14 the second definition would be "small of its kind or  
15 in amount."

16 Q. And the examples are "a slight chance" and  
17 "a slight odor."

18 A. Yes.

19 Q. And do you think these definitions have  
20 changed between 1989 and today?

21 A. I am not a linguistics expert. I know of no  
22 reason that they would have done.

23 MR. ROSENTHAL: Please mark this document.

24 (Exhibit 537 was marked for  
25 identification.)

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